

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE ABI JAOUDI AND AZAR TRADING
CORPORATION,

Plaintiff,

v.

CIGNA WORLDWIDE INSURANCE COMPANY,

Defendant.

Civil Action No. 91-6785

RESPONSE TO DEFENDANT'S LATEST MOTION


Pursuant to this Court's Order of September 15, 2011 (Doc. # 278), the undersigned submits this response to Defendant's motion seeking, *inter alia*, an Order requiring the undersigned to produce documents listed on privileged logs (a) the undersigned did not prepare (b) for an individual the undersigned did not represent (Respondent Lohman).

The undersigned has reviewed documents received during the course of representing Respondents Senesie and Sesay and, with one possible exception, has been unable to locate any documents that appear to be listed on Lohman's privilege logs. The one exception is an Order of the Liberian Court that has already been filed of record both in this Court and in the Third Circuit – assuming, that is, that the Order identified in the log is the same document; if not, the undersigned has located no documents in the undersigned's files as described in Lohman's privilege logs.

Under the circumstances – and given that Defendant has utterly failed to offer the Court any legal authority entitling it to discovery from the undersigned even though directed by this

Court to do so – the Court should now enter an Order precluding Defendant from subjecting Reed Smith LLP and any of its partners, counsel, associates, or employees, including but not limited to Henry F. Reichner, to any form of discovery or similar process.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Henry F. Reichner, hereby certify that a true and correct copy of the foregoing document was served as indicated on the following on this date:

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Dated: October 11, 2011


Henry F. Reichner, Esquire